

1 LAWRENCE A. ORGAN (SBN 175503)
2 NAVRUZ AVLONI (SBN 279556)
3 CIMONE A. NUNLEY (SBN 362915)
4 **CALIFORNIA CIVIL RIGHTS LAW GROUP**
5 332 San Anselmo Ave.
6 San Anselmo, California, 94960
7 Telephone: (415) 453-4740
8 Facsimile: (415) 785-7352
9 larry@civilrightsca.com
10 navruz@civilrightsca.com

11 J. BERNARD ALEXANDER (SBN 128307)
12 **ALEXANDER KRAKOW + GLICK LLP**
13 1900 Avenue of the Stars, Suite 900
14 Los Angeles, California 90067
15 Telephone: (310) 394-0888
16 Facsimile: (310) 394-0811
17 balexander@akgllp.com

18 Attorneys for Plaintiffs
19 DEMETRIC DI-AZ and OWEN DIAZ

20
21 UNITED STATES DISTRICT COURT
22
23 NORTHERN DISTRICT OF CALIFORNIA

24
25 DEMETRIC DI-AZ, OWEN DIAZ, and
26 LAMAR PATTERSON,

27 Plaintiffs,

28 v.

29 TESLA, INC. dba TESLA MOTORS, INC.;
30 CITISTAFF SOLUTIONS, INC.; WEST
31 VALLEY STAFFING GROUP;
32 CHARTWELL STAFFING SERVICES, INC.;
33 and DOES 1-50, inclusive,

34 Defendants.

35 Case No. 3:17-cv-06748-WHO

36
37 **[PROPOSED] ORDER GRANTING
38 PLAINTIFFS' ADMINISTRATIVE
39 MOTION TO FILE DOCUMENTS
40 UNDER SEAL IN SUPPORT OF
41 PLAINTIFFS' REPLY IN SUPPORT OF
42 THEIR MOTION FOR SANCTIONS
43 PURSUANT TO FRCP 37(B)(2)(A)**

44 Date: February 19, 2020
45 Time: 2:00 p.m.
46 Courtroom: 2, 17th Floor
47 Judge: Hon. William H. Orrick

48 Trial Date: May 11, 2020
49 Complaint filed: October 16, 2017

[PROPOSED] ORDER

Pursuant to Local Rules 7-11 and 79-5, as well as this Court's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz have filed an administrative motion for an order sealing the physical copies in the Court's files of Exhibit A to the Supplemental Declaration of Cimone Nunley in Support of Plaintiffs' Administrative Motion to File Under Seal. According to the declaration filed by Plaintiffs' counsel, Cimone Nunley, in support of this Motion, Exhibit A should be sealed for the foregoing reasons:

Document	Basis for Sealing
Exhibit A: Deposition of Edward Romero	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Appearing the requested relief is warranted, this Court orders that:

1. Plaintiffs' Administrative Motion to File Documents Under Seal in Support of Plaintiffs' Motion for Sanctions is GRANTED.
2. The physical copies in the Court's files of Exhibit A to the Supplemental Declaration of Cimone Nunley in Support of Plaintiffs' Administrative Motion to File Under Seal shall be SEALED and remain sealed until further order of the Court.

IT IS SO ORDERED.

DATED: _____, 2020

The Honorable William Orrick
United States District Court Judge